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5 \**Pro Hac Vice Applications to be Submitted*

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11 **ATTORNEYS FOR OPERATORS OF**  
12 **NHENTAI.NET**

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA  
15 WESTERN DIVISION

16 PCR DISTRIBUTING CO., a company  
17 organized under the laws of California,

18 Case No. 2:24-cv-07453- FLA-AJR

19 Plaintiff  
20 vs.  
21 **NHENTAI.NET'S RESPONSE TO**  
22 **PLAINTIFF'S MOTION FOR**  
23 **EARLY DISCOVERY**

24 JOHN DOES 1-20 d/b/a  
NHENTAI.NET

25 Date: October 4, 2024; 1:30 p.m.

26 Place: First Street Courthouse

27 350 W. 1st Street

Courtroom 6B, 6th Floor

Los Angeles, California 90012

Judge: Hon. Fernando L. Aenlle-Rocha

TO THE HONORABLE COURT:

The operators of the nhentai.net website (“Nhentai.net”) whose information is the subject of PCR Distributing, Co.’s (“Plaintiff” or “PCR”) Motion for Early Discovery (Dkt. No. 10) hereby notify the Court and counsel for Plaintiff that Nhentai.net intends to file a Motion for Protective Order and to permit any potential Nhentai.net-related defendants to proceed anonymously. Counsel for Nhentai.net has only recently learned of the early discovery proposed by Plaintiff into information of a highly confidential and sensitive nature, including Nhentai.net’s ***“login information, billing and transaction records, account information, server logs and IP addresses, email exchanges, and IP login information*** related to the Defendants’ accounts for the NHentai.net domain name.” Dkt. No. 10 at 7, lines 10-14 (emphasis added). Among other things, Plaintiff’s request implicates serious data privacy concerns relating to Nhentai.net’s login information. Plaintiff is also broadly requesting Nhentai.net’s private and highly confidential financial information such as billing and transaction records and account information, which would necessarily include payment information such as complete credit card numbers. Plaintiff does not propose any protections for such information being made public.

Prior to deciding Plaintiff's Motion for Early Discovery (Dkt. No. 10), Nhentai.net respectfully asks this Court to permit Nhentai.net to file motions for protection relating to the information sought by Plaintiff's overly broad and highly improper requests and how it may be used in this case going forward.

Dated: September 26, 2024

By: Mark Tittel

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12 **Attorneys for Operators of  
Nhentai.net**

14 **CERTIFICATE OF SERVICE**

15 On September 26, 2024, I filed the foregoing document with the clerk of court  
16 for the U.S. District Court, Central District of California via CM/ECF. I hereby  
17 certify that I thereby have served the document on all counsel and/or pro se parties  
18 of record by a manner authorized by Federal Rule of Civil Procedure 5(b)(2) and the  
19 Local Rules.

20 /s/ *Glenn Litwak*